



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



DANIEL EICHINGER
ACTING DIRECTOR

April 7, 2023

VIA EMAIL and U.S. MAIL

Jim Saric
Remedial Project Manager
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (S-6J)
Chicago, Illinois 60604-3511

Dear Jim Saric:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE) comments on the revised Area 1 Remedial Reach Temporary Excavation Support Plan (TESP), dated March 16, 2023, and the revised Area 1 Remedial Reach Remedial Action Work Plan (RAWP), Construction Work Plan (CWP), and Appendices, dated March 9, 2023, Operable Unit 5 (OU5), Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site (Site).

By way of this correspondence, EGLE formally submits this cover letter and detailed comments (attached) on the subject TESP, RAWP, and CWP for the Remedial Reach in Area 1 for inclusion in the Administrative Record for the Site.

EGLE did not have any comments on the revised TESP, and our comments on the revised RAWP and CWP are minor.

EGLE appreciates the opportunity to review and comment on the subject work plans OU5. If you have any questions, please contact Daniel Peabody, Environmental Quality Analyst, Remediation and Redevelopment Division at 517-285-3924; PeabodyD@Michigan.gov; or EGLE, P.O. Box 30426, Lansing, Michigan 48909-7926

Sincerely,

Daniel Peabody
Environmental Quality Analyst
Superfund Section
Remediation and Redevelopment Division

cc/att:

Greg Baker, National Oceanic and Atmospheric Administration

Dr. Keegan Roberts, CDM Smith

Lisa Williams, United States Fish and Wildlife Service

Matt Diana, MDNR

Brian Gunderman, MDNR

Mark Mills, MDNR

David Kline, EGLE

Joseph Walczak, EGLE

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Revised Remedial Action Work Plan, Temporary Construction Plan, and Appendices, Area 1 Remedial Reach,
Operable Unit 5
March 9, 2023

SPECIFIC COMMENTS

Commenting Organization: EGLE

Section: 4.2

Page #: 6

Specific Comment #1: Confirm the basis for extending the drying time to 6-8 days for Portland cement amendment. Did you test any stockpiles with longer drying times in 2022? Eight days can be a lot of time for concrete to setup and may create difficulties with removing material. How will you manage the material if the concrete sets up too much?

Commenting Organization: EGLE

Section: 4.3

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Specific Comment #2: Due to the volume of sediment to be processed in SPA-3 EGLE recommends that an asphalt layer be added above the stone and geotextile layer even with the use of mixing bins. This will also assist with collecting of stormwater in contact with contaminated material and may prevent the gravel from being contaminated with spilled material from handling. Additionally, the asphalt layer will add additional protection to the liner from activities such as delivery and removal of bins and excavator movements.

Commenting Organization: EGLE

Section: Figure 1

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Specific Comment #3: A few comments on the proposed layout for RSA 2 shown in Figure 1.

1. The proposed layout for remediation support area 2 (RSA 2) shows a single entrance and exit in the southwest corner of the area, the traffic route and pattern is a one-way, single road loop extending from the entrance/exit to the northeast corner of RSA 2, and the office trailers are located on the far north end of RSA 2 between the backwater that forms dredge management unit (DMU) KRT 5-10 and the tip of the traffic loop. With this layout, workers and visitors (on foot or in a vehicle) will have to enter the same traffic pattern and route that will be utilized by haul trucks and heavy equipment on-site. This could present a safety hazard for workers and visitors in smaller vehicles and increases the potential for contaminated materials to be inadvertently spread around the project area and/or leave the site. Consider adding barriers and signage to separate worker and visitor traffic from on-site construction traffic or adjusting the layout so that there is a dedicated roadway for worker/visitor traffic.
2. Without a contour map showing elevations across RSA 2 it is difficult to understand the change in elevation across the area. However, given the proximity of the job trailers to DMU KRT5-10, it is likely that this location is at a relatively low elevation compared to other locations in RSA 2. Please insert a text box showing the elevation near the job trailers. Insert another text box highlighting the lowest elevation in RSA 2.
3. RSA 2 includes 10 bins for PCB contaminated sediments which make up the sediment processing area (SPA). Nine (9) bins (BIN 1 through 9) are for handling/storing contaminated materials with PCB concentrations less than 50 milligrams per kilogram (mg/kg) and each of these bins is sized to hold a volume of 275 cubic yards (yd³). Three of these bins (BIN 1, 2, and 3) are immediately adjacent to the river, although they are likely just outside of the 25-year flood boundary. RSA 2 also has one bin for handling/storing approximately 800 yd³ of material with PCB concentrations greater than 50 mg/kg, and this bin is located approximately 75 feet from the river channel and is adjacent to BINs 7,8,9. Due to the low-lying nature of RSA 2 and locations proposed to store contaminated materials, dredging operations will need to stop and staff will need to immediately begin emptying contaminated sediments from the RSA 2 SPA if

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there are forecasts for inclement weather and potential for flood conditions that would inundate the RSA 2 SPA.